



Allyson Brooks Ph.D., Director  
State Historic Preservation Officer

May 21, 2020

Mr. Keith Jones  
Senior Planner  
City of Vancouver  
415 W 6th St  
Vancouver, WA 98668-1995

In future correspondence please refer to:  
Project Tracking Code: 2020-05-03511  
Property: Providence Academy; 400 E Evergreen Blvd, Vancouver  
Re: SEPA - New development (Phase 2)

Dear Mr. Jones:

Thank you for contacting the Washington State Historic Preservation Officer (SHPO) and Department of Archaeology and Historic Preservation (DAHP). The above referenced resource has been reviewed on behalf of the SHPO pursuant to the Washington State Environmental Policy Act (SEPA). Our review is based upon documentation contained in your communication as well as our correspondence over the past several months.

The House of Providence, commonly now referred to as the Providence Academy, began construction in 1873. It was listed in the National Register of Historic Places in 1978 at the National level of significance, and includes the main Academy building itself as well as several outbuildings including the Laundry Building, Boiler House, Gymnasium and Smokestack. The previously existing Well House was previously demolished, but its remains are considered a significant archaeological resource. All of these elements are contributing structures and features to the listed property. Thus, any loss of said contributing features and structures should be dutifully recorded and mitigated.

The Laundry Building, Boiler House, Well House remnants, and Smoke Stack are located within the boundaries of archaeological site 45CL00152. A DAHP Site Alteration & Excavation Permit must be applied for and granted prior to the demolition of any of these structures. A DAHP Permit will also be required for any ground disturbing activities within the archaeological site prior to demolition. Archaeological testing may be required in advance of demolition, and thus the DAHP encourages consultation about this process well in advance of any planned building demolition.

Several of the proposed mitigations measures in the document you provided to us include language such as "will explore options" and "will be considered." We highly recommend hard commitments to these proposed mitigation measures to better specify anticipated deliverables.

Considering the age and significance of the buildings to be demolished, we strongly recommend completing Historic American Buildings Survey (HABS) level documentation. The standards for this documentation are far more robust and commensurate with the level of significance these structures have for the State of Washington and the Nation.

We also recommend the following mitigation measures to be implemented:

- Submit a revised National Register nomination for the House of Providence / Providence Academy after the resources are removed. This would update the nomination so that it's more current, and would bring the document up to current documentation standards.



- Submit a nomination to the local historic register for the Providence Academy.
- Specifically address treatment, recordation, or both for the Wells House remnants, which are not currently addressed in the mitigation measures. As with any historic or cultural resource, we strongly recommend preservation or rehabilitation in place in such a way that the resource can be interpreted for its historic value.
- Develop a podcast series or other method of multimedia engagement intended to reach a wide audience regarding the Academy's history and its preservation / rehabilitation.
- Update the VCCV sub-area plan based on public input and recent conversation regarding implementation of this key planning tool for protecting the building's historic status and significance.

We appreciate your willingness to collaborate with us on mitigation opportunities for the loss of these historic resources. We look forward to continued conversations and implementation of the mitigation measures. Thank you for the opportunity to review and comment. If you have any questions, please feel free to contact me.

Sincerely,



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cc: Jan Bader, City of Vancouver  
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Jordan Mercier, Grande Ronde  
Jacqueline Kamp, Clark County  
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